



Minnesota Department of Natural Resources

500 Lafayette Road
St. Paul, Minnesota 55155-4025

June 6, 2005

Honorable Judge Bruce H. Johnson
Office of Administrative Hearings
100 Washington Avenue, Suite 1700
Minneapolis, MN 55401-2138

RE: High Bridge Repowering Project Environmental Assessment
EQB Docket #05-91-PPS-Xcel Energy High Bridge



Dear Judge Johnson:

The Department of Natural Resources (DNR) has reviewed the Environmental Assessment (EA) for the proposed Xcel Energy Repowering Project in St. Paul, Ramsey County, MN. With respect to potential impacts to natural resources, and in accordance with Minnesota Statutes §116C.575 subd.6, the DNR offers the following comments.

4.3 Natural Resources – Topography/Landform (p.25)

The project site is within the state-designated Mississippi River Critical Area Corridor District, in addition to the referenced federal MNRRA. The Mississippi River and its adjacent 54,000 acre Corridor within the seven-county Twin Cities Metropolitan Area was designated a State Critical Area on October 18, 1976, and is associated with a state-mandated program for local units of government, state agencies, and regional agencies. The boundaries of the Mississippi River Critical Area Corridor and the 1988 federal Mississippi National River and Recreation Area are the same. State agencies are required to follow the standards included in the Critical Area Executive Order 79-19 during permit regulation. These standards can be referenced at: http://files.dnr.state.mn.us/waters/watermgmt_section/critical_area/execord.pdf.

The purposes of designating the Mississippi River and its Corridor as a state Critical Area since 1976 include protecting and preserving a unique and valuable state and regional resource for the benefit of the citizens for the state, region, and nation; preventing and mitigating irreversible damage; preserving and enhancing its natural, aesthetic, cultural, and historical value for public use; protecting and preserving the river as an essential element in the national, state and regional transportation, sewer and water and recreational systems; and protecting and preserving the biological and ecological functions of the Corridor.

5.2 Land Use (p.32)

The EA correctly notes that the City of St. Paul has designated the project site as an I-2 industrial zone. The project site is also part of the River Corridor Overlay District and is currently designated as RC2 Flood Fringe District and RC-4 Urban Diversified District by the City of St. Paul Zoning Code Chapter 68.

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Thank you for the opportunity to review this document. Please contact me with any questions regarding this letter.

Sincerely,



Matt Langan, Environmental Planner
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(651) 297-3359

c: Commissioner Gene Merriam, Lee Pfannmuller, Tim Bremicker, Tom Balcom, Wayne Barstad,
Sandy Fecht, Bill Storm - EQB

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